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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re patent application of:	) Attorney Docket No.: E-679
GLEN BOUCHER, ET AL	) Group Art Unit: 2171
Serial No.: 08/942,264	) Examiner: T. PARDO
Filed: October 1, 1997	) Date: June 1, 2001

Title: **A METHOD AND SYSTEM FOR CHANGING RATING DATA VIA INTERNET OR MODEM IN A CARRIER MANAGEMENT SYSTEM**

TRANSMITTAL OF APPEAL BRIEF (PATENT APPLICATION 37 CFR 1.192)

Assistant Commissioner for Patents
Washington, D.C. 20231

Sir:

Transmitted herewith in **triplicate** is the **APPEAL BRIEF** in the above-identified patent application with respect to the Notice of Appeal filed on February 1, 2001.

Pursuant to 37 CFR 1.17(c), the fee for filing the Appeal Brief is $310.00

Applicant petitions for a one-month extension of time under 37 CFR 1.136. The fee for a one-month extension of time is $110.00,.

The total fee due is:

Appeal Fee:	$310.00
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The Commissioner is hereby authorized to charge any additional fees which may be required to Deposit Account No. **16-1885**.

A duplicate copy of this transmittal is enclosed for use in charging the Deposit Account.

Respectfully submitted,

Alberta A. Vitale
Reg. No. 41,520
Attorney of Record
Telephone (203) 924-3882

PITNEY BOWES INC.
Intellectual Property and
Technology Law Department
35 Waterview Drive
P.O. Box 3000
Shelton, CT 06484-8000

CERTIFICATE OF MAILING

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Assistant Commissioner for Patents
Washington, D.C. 20231

On June 1, 2001
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Alberta A. Vitale
Name of Registered Rep.
Reg. No. 41,520

Signature

June 1, 2001
Date

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6/8/01
A.W.

PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re patent application of:	)	Attorney Docket No.:	E-679
Glen Boucher, et al.	)	Group Art Unit:	2171
Serial No.: 08/942,264	)	Examiner:	Thuy Pardo
Filed: October 1, 1997	)	Date:	June 1, 2001

Title: A METHOD AND SYSTEM FOR CHANGING RATING DATA VIA INTERNET OR MODEM IN A CARRIER MANAGEMENT SYSTEM

APPELLANTS' BRIEF

Box AF
Assistant Commissioner for Patents
Washington, D.C. 20231

Sir:

This brief is in furtherance of the Notice of Appeal filed in this case on February 1, 2001.

This brief is transmitted in triplicate.

TABLE OF CONTENTS

This brief contains these items under the following headings and in the order set forth below:

I. REAL PARTY IN INTEREST

Pitney Bowes Inc., a Delaware corporation having its principal place of business in Stamford, Connecticut, is the real party in interest by way of assignment from the Appellants.

II. RELATED APPEALS AND INTERFERENCES

There are no other appeals or interferences that will directly affect or be directly affected by or have a bearing on the Board's decision in this appeal.

III. STATUS OF CLAIMS

A.) Claims 10 are pending.

B.) Claims 1-10 are on appeal.

The currently pending claims are attached as Appendix A.

IV. STATUS OF AMENDMENTS

Appellants received a Final Office Action dated November 1, 2000 rejecting claims 1-10. Appellants filed a Notice of Appeal on February 1, 2001. An Amendment After Final Rejection was filed concurrently with the Notice of Appeal. The Amendment After Final Rejection should have been titled "Response After Final Rejection" since no amendments were made by that document. The Advisory Action indicated that amendments would be entered upon filing of a Notice of Appeal and an Appeal Brief. Appellants wish to clarify to the Board that no amendments were made in the document titled "Amendment After Final Rejection" and therefore, no amendments after final rejection need to be entered.

V. SUMMARY OF INVENTION

A. INTRODUCTION

The present invention relates generally to computer systems, and more particularly relates to automatically selecting and importing information from a network resource, and formatting the information for use by a local processing resource. (Specification, Page 1, lines 5-8) The present invention is directed toward a method and system for rating charges to be applied to parcels, letters, or similar items to be transported by a carrier as selected from among a set of carriers. (Specification, Page 3, lines 4-7).

B. BACKGROUND

The ability of shippers to get parcels from the loading dock to the final destination in shorter time spans and at less cost has increased in recent years. The growth of the overnight carriers, and the consistency of the two and three day delivery carriers has created vast fleets of transport vehicles representing each of the many transportation modes. These, in turn, benefit from efficient manifesting and logistical accounting.

Carriers are companies that provide services to their clients for facilitating the transport of letters, parcels, bulk goods, or anything that can be shipped by public, common, or specialized transport means. There is a great variety in the types and scope of services that can be provided by the individual carrier.

The growth of shipping demand has fueled the drive for efficiencies that each of the carriers has been developing. Technological advances and better methods of doing business have in turn spurred greater demand for carrier services. The net result is that the volume of parcels being shipped has continued to spiral upward.

Systems and methods have been proposed to more efficiently handle the increased volume of parcels and the proliferation of carrier services that are available. Carriers have introduced systems and methods that are targeted to that carrier only. Shippers have looked for systems that provide them with a means to rate or service

shop. The object of all of these systems has been to get a parcel on from point A to point B, efficiently.

Carrier Management Systems can generally include as peripheral elements: a microprocessor; keyboard; monitor; platform scale; printer; and possibly a scanner. The system can automatically prepares documents for shipping articles to any desired number of different receivers by any selected carrier or mode.

The ability of carriers to respond to shipper needs is based on the carrier's capacity. Carrier capacity is the space that is available at any given time in the vehicle representing the carrier's mode of transport. For every shipment that leaves the dock of a shipper bound for a particular destination, a carrier makes available a mode of transportation. Each mode of transportation has its unique vehicle for transport: freight cars via rail; containers via ship; cubic inches via truck; etc. This capacity must be rated in some manner according to the rating data developed and promulgated by each of the carriers.

Each carrier has its own rate structure for service charges. Typically, rate structures are complex and involve a variety of factors; these factors may include: distance from origin to destination; weight rating; dimensional rating; service rating; and mode of transport. Thus, the business rules for rating items to be transported varies greatly from carrier to carrier. Rating calculations may shift over time depending upon shifts in the business or carrier climate. Accordingly, it is desirable to provide a mechanism for updating how carrier rates are calculated.

The efficiency of rating techniques has been enhanced by prior art such as: 1) a method for automatically applying customized rating adjustments to transaction charges where charges are determined by partitioning a class of transactions into cells in accordance with pre-determined criteria, determining base rates for the resulting cells, and applying customized rates to certain cells before transmitting the combined rate data to a shipping system data center; and 2) a method of automatically applying customized rating adjustments to transaction charges.

The prior art works well in embedded systems or in an intranet environment where the systems administrator or systems user has some measure of control over the operating system platforms that are storing data, applying rating charges, and storing

the data within a data center. However, the advancement of data processing systems and the ability of varying logistics services applications to require data sharing for the purposes of optimizing logistics operations has created a definitive need for systems of varying architecture, and with varying operating systems, to be able to share data within a common environment. Thus, there is a need for a logistics/shipping system capable of managing diverse applications within a common environment for optimal service. Additionally, a method of employing the rating functionality of one application within the functionality of another application is required.

As the capabilities of data processing systems has grown, so too have the requirements that are tasked to these systems. Greater speed has given rise to more detail oriented applications, greater memory capability has made memory intensive applications more attractive, and detailed applications have lead to more wide-spread use of previously inaccessible data processing abilities. With the spiraling growth in data processing ability, there has grown a need for more efficient ways of programming that promote speed as well as flexibility. Flexibility, in particular, allows applications that have been designed in varied programming languages, or operating on different platforms to be able to communicate without extensive system or file modification.

Once such means of promoting flexibility within a data processing system is in the use of object oriented design (OOD). Object oriented programming languages are useful in removing some of the restrictions that have hampered application design due to the inflexibility of traditional programming languages.

OOD utilizes a basic element or construct known as the "object," which combines both a data structure and an intended behavior characteristic within the single element. Thus, software applications become an organized collection of discrete objects in which data is held or moved based on the intended behavior of an object which is inherently unique. Each object knows how to perform some activity. Objects can be specific or conceptual. But, to be of value to a particular application, objects must be able to be referenced.

Referencing is accomplished through indexing, addressing, or through value assignment which can be placed in a table for use as required. Objects can also be arranged by classification. Classification is based on groupings of objects based upon

properties or characteristics important to an application or requirement. Each class describes a potentially infinite set of objects that comprise that class.

OOD is known in the software arts and specific discussion of application design based upon OOD is not required for a thorough understanding of the Appellants' claimed invention. The use of object oriented design, together with the use of an OCX to facilitate object oriented linking of diverse applications, is a distinct benefit when employed within data processing systems such as logistics systems with rating applications. Therefore, it is an object of the Appellants' invention to provide for an object oriented method and system, of communication via the globally accessible computer network known as the Internet. The Internet is a vast resource of information, much of which is available at no direct cost. A local computer can connect to a distant server, request a file or an image from the server, and receive the requested information immediately without a direct charge for the value of the information.

One popular technology enjoying wide use with the Internet is known as the World Wide Web. The World Wide Web enables a computer to locate a remote server using a server name in an agreed-upon format that is indexed at a central Domain Name Server (DNS); the computer can then establish a connection to the server and retrieve information using a communication protocol called the Hypertext Transfer Protocol (HTTP). A Uniform Resource Locator (URL) uniquely identifies each page of information stored on the remote server. A URL is a form of network address that identifies the location of information stored in a network. The local computer requests information by providing a request containing a URL of the desired information to the remote server. The pages of information are files prepared in the Hypertext Markup Language (HTML).

For all these reasons, there is a need for methods, apparatus and products that can request and retrieve information from a remote source; format the information for local use; and pass the formatted information for local use. There is also a need for such methods, apparatus and products that can retrieve such information in an automatic way, and automatically format the information for use by a local processing resource.

Support for the above summary, as well as a more detailed description, is found in the written specification and the accompanying figures. (See specification, Page 3, line 1 to Page 8, line 18).

C. APPELLANTS' METHOD AND SYSTEM FOR CHANGING RATING DATA VIA INTERNET OR MODEM IN A CARRIER MANAGEMENT SYSTEM

The present claimed invention is a method and system of updating a set of data objects within a Data Access System (DAS). The method begins by initiating a communication link, through a modem or similar communication link, between a client data processing system and a host data processing system.

Once a communications link is established, a set of object tables is uploaded from the client data processing system to the host data processing system. The object tables are read at the host data processing system; and, a determination is made as to which data objects in the set of object tables are to be updated. It is also determined which data objects in the set of object tables is to be simply maintained. A new set of object tables is then constructed at the host data processing system and transmitted to the client data processing system.

Upon receipt of the new file tables, the client system performs the task of verifying accurate receipt of the new set of object tables prior to restarting the client data processing system. The verification step includes saving at the host data processing system, a first data map of the new set of object tables as a record of which objects were transmitted. The new set of object tables is then received and saved within a memory of the client data processing system before retransmitting the new set of object tables as a second data map back to the host data processing system from the client data processing system. The second data map is then compared with the first data map to form a comparison, and if the first data map and the second data map do not match, then the verification is nulled. (Page 8, line 20 to Page 9, line 21 of the specification).

In summary, the Appellants' claimed invention transfers object tables from a client to a host; the process is **transparent** to a system user.

VI. ISSUES PRESENTED FOR REVIEW

1) Whether the rejection of claims 1-10 (claim group 1) under 35 USC § 103(a) as being unpatentable over Carroll et al. U.S. Patent No. 5,293,310 in view of Owens et al. U.S. Patent No. 6,047,267 was proper?

VII. GROUPING OF CLAIMS

A. Claim Group 1 contains claims 1-10, which stand or fall together with regard to the rejection under 35 USC § 103(a).

VIII. ARGUMENTS

A. Introduction

In a Final Office Action, mailed November 1, 2000, the Examiner finally rejected claims 1-10 under 35 U.S.C. § 103(a) as being unpatentable over Carroll et al. (Carroll) U.S. Patent No. 5,293,310 in view of Owens et al. (Owens) U.S. Patent No. 6,047,267.

1. Summary of Carroll

Carroll, U.S. Patent No. 5,293,310, issued March 8, 1994 and titled FLEXIBLE METHOD FOR APPLYING CUSOTMIZED RATING ADJUSTMENTS TO TRANSACTION CHARGES is related to data processing methodology and apparatus for effecting an improved customized rating adjustment to transaction charges. More specifically, this invention is directed to a process and a system for rapidly and reliably applying surcharges and discounts to transaction charges in a shipping system. (Col. 1, lines 7-12). Carroll teaches that a representative of the carrier forwards an order form

to a data center. The process of forwarding can be completed via a transmission medium such as facsimile. Upon receipt of the order form, the data center verifies the authority of the sender and, upon approval, must then convert the data contained in the order form into an appropriate update format. (Col. 6, lines 57-68).

Carroll discloses a method for automatically applying customized rating adjustments to transaction charges. Charges are determined by partitioning a class of transactions into cells in accordance with pre-determined criteria, determining base rates for the resulting cells, and applying customized rates to certain cells before transmitting the combined rate data to a shipping system data center.

2. Summary of Owens

Owens, U.S. Patent No. 6,047,267, issued on April 4, 2000 and titled METHOD AND APPARATUS FOR TRACKING MULTIPLE PAYMENT RESOURCES AND CHARGING TRANSACTIONS TO PAYMENT RESOURCES IN ON LINE TRANSACTION PROCESSING SYSTEM is directed generally to methods and apparatuses for tracking multiple payment resources according to a flexible rating engine in an on-line transaction processing system. (Col. 1, lines 11-15). More specifically, the invention relates to methods and apparatuses for debiting and crediting existing payment resources using an object oriented scheme. Data relating to payment resources is transferred to and from an object server using a container object. The object server interacts with both a transient storage that is organized according to an object oriented scheme and a persistent storage that is organized according to a relational database management scheme. The relational database in persistent storage is designed by the object server. This includes defining the tables of the relational database as well as the various columns. The object server then stores and retrieves data from the various tables defined in persistent storage according to hierarchical tree that maps data encapsulated within objects to table locations in the relational database found in persistent storage. (Col. 1, lines 16-32).

Thus, Owens teaches an object oriented programming environment in which an object oriented database defines payment resources. Owens defines the object to be stored within the Owens system as:

> a container object that allows a user to define new payment resources without requiring the user to redesign a relational database system used for persistent storage of transaction information. An object server maps data that is represented in transient memory according to an object-oriented scheme to [store] data that is represented in persistent memory according to a relational database scheme.

(Col. 2 line 63 to col. 3, line 13). Owens does not teach that objects within the database can be presented, updated, recreated, and then retransmitted back to the originator. Owens is merely concerned with storage. (Col. 7, lines 32-44).

B. Whether the rejection of claims 1-10 (claim group 1) under 35 USC § 103(a) as being unpatentable over Carroll U.S. Patent No. 5,293,310 in view of Owens U.S. Patent No. 6,047,267 was proper?

Claim 1

Independent Claim 1 is drawn to, "[I]n a carrier management system comprising a client data processing system and a host data processing system, a method of updating a set of data objects within a Data Access System (DAS), comprising the steps of: (a)initiating a communication link between said client data processing system and said host data processing system; (b) uploading a set of object tables from said client data processing system to said host data processing system; (c) reading said set of object tables at said host data processing system; (d) determining which data objects in said set of object tables is to be updated and further determining which data objects in said set of object tables is to be maintained; (e) constructing a new set of object tables, at said host data processing system; (f) transmitting said new set of object tables from said host data processing system to said client data processing system; (g) verifying accurate receipt of said new set of object tables at said client data processing system; and h) restarting said client data processing system.

The remarks of the Final Office Action state that:

(A) Applicant argues that prior art does not teach the limitation of "uploading a set of data from the client data processing system to the host data processing system";
(B) Applicant argues that Carroll does not teach updating a set of data objects; and.
(C) Applicant argues that Carroll does not teach an object oriented environment.

(Final Office Action, paragraph 6, Pages 2-3).

Regarding remark (A), Examiner respectfully disagreed and the Final Office Action stated that "this feature was taught by Carroll. Carroll teaches the same functionality corresponding to a data rating in a carrier management system. Moreover, Carroll also teaches that when the application is completed at the user station 10, it will be forwarded to the data center 14 for processing [see fig. 1, and col. 6, lines 57-68]." (Final Office Action, paragraph 6, pages 2-3).

The Appellants respectfully submit that the Final Office Action is arguing the result of the steps taken by Carroll to achieve an end and is not addressing the Appellants' steps themselves; and, it is the steps that comprise the Appellants' claimed invention. The Final Office Action merely states a conclusion in determining a rejection and has not addressed the Appellants' detailed remarks with respect to traversal of the Examiner's conclusion.

Carroll teaches that a representative of the carrier forwards an order form to a data center. (Col. 6, lines 57-59). The process of forwarding can be completed via a transmission medium such as facsimile. Upon receipt of the order form, the data center verifies the authority of the sender and, upon approval, must then convert the data contained in the order form into an appropriate update format. **The process of Carroll is not the process of Appellants' application.**

The Appellants claimed invention transfers object tables from a client to a host; the process is **transparent to a system user**. Indeed, a system user would be incapable of locating an object and transferring it anywhere. Further, the data of Carroll must be parsed in some form by the data center; this is not equivalent to the uploading

of an object table that comprises objects that further comprise a set of functions performed by the object.

The use of objects to carry data, store instructions, provide functionality, and establish their own interface through stored instructions, provides value to objects that was never possible with stored table data such as is found in Carroll. Additionally, Carroll neither taught nor disclosed that a set of data objects within a Data Access System could be updated; this fundamental element is part of the Appellants' preamble to claim 1 because the object oriented programming environment, which was never contemplated by Carroll, serves as the basis for the data processing environment of the Appellants' claimed invention. If Carroll neither taught, nor suggested that object oriented programming was possible, let alone that it was advantageous in saving time and memory resources within its host system, then Carroll can not support the Examiner's premise that Carroll teaches the invention substantially as claimed.

Explained another way, the Appellants respectfully submit that Carroll neither taught nor suggested that reading the set of object tables of the Appellants' claimed invention was possible; and, even if Carroll could read the object tables, Carroll would have not been able to do anything with the objects because Carroll could not function within an object oriented environment. Additionally, the reading of an input file (as described in Carroll) is not analogous to reading object files. An input file, as taught by Carroll, contains rate data (or the like), upgrades or modifications that are added to pre-existing files that can be accessed to determine specific rates for a transaction under specific circumstances (Carroll, col. 13, lines 32-41). An object table, on the other hand, stores objects that are to be utilized not only for their data content, but for the functionality they contain (Specification, page 7, lines 25 and page 18, lines 13-23).

Thus, Carroll never performed Appellants' claimed step of **"uploading a set of object tables"** as is claimed in the Appellants claim 1(b) because **Carroll was not designed to do anything with objects or to function within an object oriented environment. And, clearly objects and table data are not analogous. Therefore, if Carroll could not use the objects, then Carroll had no need to upload object tables.**

Regarding remarks (B) and (C), the Final Office Action stated in support of the rejection that:

> (B) "Examiner respectfully disagrees. Carroll teaches updating data contained in the order form 18 in the data center 14 into an appropriate update format before sending back to the user station [col. 7, lines 3-30].";

and,

> (C) "Examiner respectfully disagrees. In the Previous Office Action, Examiner admits that [the] Carroll does not explicitly teach an object oriented environment although it has the same functionality of processing data in a carrier management system. However, Owens reference teaches forwarding an object-oriented application from the client 101 to the object server 105 [see fig. 3]. The object server then generates appropriate tables and column for a relational database scheme automatically [see the abstract]."

(Final Office Action, Page 3, Paragraphs (B) and (C)). The Appellants respectfully respond to points (B) and (C) together as they both refer to whether Carroll teaches an object oriented environment.

In making the rejection, the Office Action stated that Carroll teaches the updating of data objects and that Carroll teaches an object oriented environment. Neither remark is supported by the Carroll disclosure. Nowhere in Carroll is there reference, citation or implication of the use, or creation of an object as such is known in the data processing arts. Object oriented programming as defined by the Appellants (Specification page 6, line 20, to page 7, line 25), and as is known in the programming arts, utilizes a basic element known as an "object". Objects can contain both a data structure and one or more intended behavior characteristics. Each object knows how to perform some activity. Carroll simply does not teach or imply the use of object oriented programming. Appellants respectfully note that the Examiner refuted the Examiner's own disagreement with the Appellants' arguments by stating that: "Examiner admits that [the] Carroll does not explicitly teach an object oriented environment although it has the same functionality of processing data in a carrier management system." (Final Office Action, Page 3, paragraph (C)). **It is the efficiency of the Appellants' claimed invention that sets it apart from Carroll with respect to the generalized result of processing carrier data. That efficiency is derived from a different architecture, a different series of implementing steps and greater speed and flexibility.**

The Appellants respectfully submit that the properties attributed to Carroll by the Examiner are simply not possible within the limited data structures available to Carroll.

The Examiner has thus established that Carroll does not teach an object oriented environment; and, as Carroll does not explicitly teach the Appellants' preamble, or any of elements 1(b), 1(c), 1(d), 1(e), 1(f), or 1(g), the Examiner has proposed that it would have been obvious to one of ordinary skill in the art to add the object oriented database of Owens into the data processing system of Carroll to accomplish what the Appellants have done.

In rejecting claim 1 under 35 U.S.C. § 103(a), the Examiner has stated that "Owens teaches mapping data according to an object-oriented scheme to [store] data in persistent memory according to a relational database scheme so that the object-oriented scheme generated by a user may be efficiently stored ..." (fig. 6; col. 2, lines 42-43).

The Appellants respectfully agree that Owens teaches an object oriented programming environment in which an object oriented database defines payment resources; however, **the presence of an object oriented environment is where the similarity with the Appellants' present invention ends**.

> Owens defines the object to be stored within the Owens system as:
>
> a container object that allows a user to define new payment resources without requiring the user to redesign a relational database system used for persistent storage of transaction information. An object server maps data that is represented in transient memory according to an object-oriented scheme to [store] data that is represented in persistent memory according to a relational database scheme. (Col. 2, line 63 to col. 3, line 13.)

Whereas, the object environment of the Appellants' claimed invention is specifically limited to a system wherein the client transmits its set of object tables to a host for updating and wherein the updated object tables form the basis of a new set of tables to be transmitted back to the client. **Owens does not teach that objects within the database can be presented, updated, recreated, and then retransmitted back to the originator.** Owens is merely concerned with storage. (Col. 7, lines 32-44).

The Appellants respectfully submit that the Examiner has not established a prima facie case of obviousness as is required under 35 USC § 103. The MPEP states that:

> To establish a prima facie case of obviousness under § 103, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. (MPEP at 2142 and 2143). The teaching or suggestion to make the claimed invention and the reasonable expectation of success must both be found in the prior art, not in applicant's disclosure. (MPEP at 2143).

The Appellants' present application cannot be obvious over Carroll in view of Owens because neither reference alone or together with the knowledge generally available teaches or suggests the Appellants' claimed invention; it also would not be obvious to one of ordinary skill in the art to modify Carroll and/or Owens to achieve what the Appellants have achieved. And, even assuming arguendo that one of ordinary skill in the art were motivated to modify Carroll and/or Owens, the result would not be the Appellants' claimed invention, as per the remarks made above or absent impermissible hindsight. The result would be a rating scheme storing one or more objects that contain data but no enabling functionality or the interface capability necessary to implement the functionality within a carrier management system. Therefore, the Appellants submit that the applied references do not provide the necessary suggestion to modify and/or combine their teachings; thus, the claimed invention can not be considered obvious over such a modification or combination in the absence of such a suggestion.

Claims 2-5 not specifically discussed above are believed allowable at least for the reasons advanced with respect to claim 1 from which they depend. Therefore, the Appellants respectfully submit that the rejection of claims 1-5 under 35 USC § 103(a) is traversed by the remarks made above.

Claim 6

Independent Claim 6 is drawn to, "[a] carrier management system comprising: (a) a client data processing system; (b) a host data processing system; (c) a Data Access System (DAS) for storing and managing a plurality of object files wherein said

plurality of object files can be accessed by said client data processing system; (d) communication means for linking said client data processing system with said host data processing system for transmitting a pre-determined set of object files under control of said DAS, between said client data processing system and said host data processing system; and (e) first memory means for storing said plurality of object files and second memory means for pre-determined set of object files."

In rejecting claim 6, the Final Office Action further stated that: "... Carroll teaches the invention substantially as claimed ...". The Appellants incorporate the arguments raised in the Remarks above with respect to the rejection of claims 1-5 under § 103(a).

Claims 7-10 not specifically discussed above are believed allowable at least for the reasons advanced with respect to the claims from which they depend. Therefore, the Appellants respectfully submit that the Examiner's rejection of claims 6-10 under 35 USC § 103(a) is traversed by the Remarks made above.

C. Conclusion

Based on the above reasoning, the Examiner's 35 USC § 103(a) rejection of claims 1-10 was improper and should accordingly be reversed by the Board of Patent Appeals and Interferences. Since this is the only outstanding issue with respect to the claims, Appellants pray for a favorable ruling and a recommendation that all claims are in condition for allowance.

Respectfully submitted,

Alberta A. Vitale

Alberta A. Vitale
Reg. No. 41,520
Attorney of Record
Telephone (203) 924-3882

PITNEY BOWES INC.
Intellectual Property and
Technology Law Department
35 Waterview Drive
P.O. Box 3000
Shelton, CT 06484-8000

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on June 1, 2001
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Alberta A. Vitale
Name of Registered Rep.

Alberta A. Vitale
Signature

June 1, 2001
Date

APPENDIX A

1. In a carrier management system comprising a client data processing system and a host data processing system, a method of updating a set of data objects within a Data Access System (DAS), comprising the steps of:

(a) initiating a communication link between said client data processing system and said host data processing system;

(b) uploading a set of object tables from said client data processing system to said host data processing system;

(c) reading said set of object tables at said host data processing system;

(d) determining which data objects in said set of object tables is to be updated and further determining which data objects in said set of object tables is to be maintained;

(e) constructing a new set of object tables, at said host data processing system;

(f) transmitting said new set of object tables from said host data processing system to said client data processing system;

(g) verifying accurate receipt of said new set of object tables at said client data processing system; and

(h) restarting said client data processing system.

2. The method of claim 1, wherein said verification step further comprises the steps of:

(a) saving at said host data processing system, a first data map of said new set of object tables as a record of which objects were transmitted;

(b) receiving and saving said new set of object tables within a memory of said client data processing system;

(c) retransmitting said new set of object tables as a second data map back to said host data processing system from said client data processing system; and

(d) comparing said second data map with said first data map to form a comparison, and if said first data map and said second data map do not match, then nullifying said verification.

3. The method of claim 1, wherein said communication link is initiated by requesting said link through a modem.

4. The method of claim 1, wherein said client data processing system and said host data processing system are each a node within a local area network comprising a plurality of nodes, wherein said each node of said local area network is linked to at least one other node within said local area network and data is exchanged between said each node and said at least one other node.

5. The method of claim 1, wherein said client data processing system and said host data processing system are each a node within a communication net and said communication link is activated within a set of protocols common to said communication net.

6. A carrier management system comprising:

(a) a client data processing system;

(b) a host data processing system;

(c) a Data Access System (DAS) for storing and managing a plurality of object files wherein said plurality of object files can be accessed by said client data processing system;

(d) communication means for linking said client data processing system with said host data processing system for transmitting a pre-determined set of object files under control of said DAS, between said client data processing system and said host data processing system; and

(e) first memory means for storing said plurality of object files and second memory means for pre-determined set of object files.

7. The Data Access System (DAS) of claim 1, wherein said DAS is co-located with said client data processing system.

8. The Data Access System (DAS) of claim 1, wherein said DAS is co-located with said host data processing system.

9. The carrier management system of claim 6, wherein said Data Access System (DAS) is co-located with said client data processing system.

10. The carrier management system of claim 6, wherein said Data Access System (DAS) is co-located with said host data processing system.